

Matthew R. McCarley  
Texas Bar No. 24041426  
**Fears Nachawati PLLC**  
5473 Blair Rd.  
Dallas, TX 75231  
214-890-0711  
Fax: 214-890-0712  
[mccarley@fnlawfirm.com](mailto:mccarley@fnlawfirm.com)

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products  
Liability Litigation

No. MDL-15-2641-PHX-DGC

**MOTION TO FILE UNDER SEAL**

Plaintiffs' Counsel, Matthew R. McCarley for Fears Nachawati PLLC, respectfully moves this Court for leave to file under seal their Response to Addendum to Recommendation to Appoint Common Benefit Fee and Costs Committee. Plaintiffs' Co-Lead Counsel and the PEC moved for leave to file the Recommendation to Appoint Common Benefit Fee and Cost Committee under seal pursuant to Federal Rule of Civil Procedure 26(c)(1)(G), Local Civil Rule 5.6, and this Court's sealed minute entry (Doc. 21432). It is in response to that request, and only in response to that request and the Addendum, that Plaintiffs move for leave to file under seal their Response to Addendum to Recommendation to Appoint Common Benefit Fee and Costs Committee.

Dated this 28th day of February 2020.

Respectfully Submitted,

By: /s/ Matthew R. McCarley

Matthew R. McCarley

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of February 2020, a copy of the foregoing pleading was filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access this filing through the Court's system and notice of this filing will be sent to these parties by operation of the Court's electronic filing system.

/s/ Matthew R. McCarley